

**August 25, 2010 Comments on the EPA CASAC Particulate Matter Review Panel Draft Letter on  
Policy Assessment for the Review of Particulate Matter National Ambient Air Quality Standard—  
Second External Review Draft (June 2010)**

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I'm Betty Plowman. I'm the membership director for the California Dump Truck Owners Association.

Our residents are dying prematurely, that is for sure. But these deaths are not due to PM2.5. These deaths are occurring because of the poverty and unemployment now ravaging our state. I cannot quote to you the number of deaths currently attributed to PM2.5 because these figures change almost daily depending on the speaker. The last communication from CARB had these deaths anywhere from 1,600 to 19,000 per year. In fact, when I questioned CARB about these fluctuations, I was told by a staff member that these were guesses. I would say that if lives are being destroyed, it should be based on more than a guess.

I would like to direct your attention to a recent study conducted by the Robert Wood Johnson Foundation from the University of Wisconsin and entitled County Health Rankings. It includes every county in the United States. I was most interested in California and was quite surprised to learn that our unhealthiest county in California is Del Norte, which borders Oregon and the Pacific Ocean. Del Norte County has zero particulate and ozone days and this unhealthy rating is attributed to poverty and unemployment.

I would also like to point out that CARB has always had within their reach a test to read opacity levels from diesel engines and in my opinion this could have gone far if it had been implemented correctly to eliminate air pollution. I have since learned from other air pollution experts that the EPA has always tried to distance themselves from tail pipe testing and I have to wonder why. Several states have this procedure in place with one critical element that California does not have and that is tying this to DMV registration. A dirty truck that could not pass this test could not be registered.

Instead, California only has spot checks on businesses with an officer going to the address of the company. Not a good method of enforcement. If there are 10% of the trucks that we now call low hanging fruit or operate dirty, I agree 100% this is not who we want operating in California. In fact, let's reduce the current legal levels by half.

I am looking at a map of the United States, which I obtained from the EPA website on June 3, 2010 titled Fine Particles and Mortality Risk. I must admit, I am confused when I see the rust belt states listed as high mortality and there is not a PM2.5 relationship to mortality in California. Can anyone explain this to me? Thank you.